# **EXHIBIT B**

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 2 of 11 Disputed Terms

	А	В
	Defs Proposed Terms	Pls Proposed Term Modifications or Reason for Rejecting Term
2	"digital citizenship"	"digital citizenship" AND "health"
		"mental health" w/15 (scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR freshman OR freshmen OR sophomore* OR junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR
3	"mental health"	"eleventh grade*" OR "grade 11" OR "11th grade*" OR crisis")"
4	<u> </u>	(("Rx" OR prescri*) w/10 ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*))
	(alcohol OR gin OR vodka OR tequila OR rum OR liquor* OR beer	((alcohol OR gin OR vodka OR tequila OR rum OR liquor* OR beer OR
	OR whiskey OR wine OR bourbon OR drunk) w/5 (student* OR	whiskey OR wine OR bourbon OR drunk) w/5 (student* OR pupil* OR
	pupil* OR scholar* OR school* OR premises OR campus* OR	scholar* OR school* OR premises OR campus* OR underage* OR
	underage* OR youth* OR child* OR teen* OR tween* OR "pre-	youth* OR child* OR teen* OR tween* OR "pre-teen*" OR minor* OR
5	teen*" OR minor* OR adolescent*)	adolescent*)) AND "health"
6	(behavior* W/3 health) w/10 (scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR freshman OR freshmen OR sophomore* OR junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*" OR "grade 11" OR "11th grade*")	((behavior* W/3 health) w/10 (scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR freshman OR freshmen OR sophomore* OR junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*" OR "grade 11" OR "11th grade*")) AND ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB)
		(distance W/5 learn*) AND ("mental health" OR "social health" OR
7	(distance W/5 learn*)	"emotional health")
	(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR freshman OR freshmen OR sophomore* OR junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh"	(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR freshman OR freshmen OR sophomore* OR junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*" OR "grade 11" OR "11th grade*") w/5 ("chromebook*" w/25 ("social media" OR Facebook OR FB OR Instagram OR "IG" OR YouTube OR
8	grade*" OR "grade 11" OR "11th grade*") w/10 "chromebook*"	"You Tube" OR "YT" OR Snap))

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 3 of 11 Disputed Terms

	А	В
		((scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR
		freshman OR freshmen OR sophomore* OR junior* OR senior* OR
	(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*"
	freshman OR freshmen OR sophomore* OR junior* OR senior* OR	OR "grade 11" OR "11th grade*") w/10 "concentrat*") AND ("social
	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh	media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR
9	grade*" OR "grade 11" OR "11th grade*") w/10 "concentrat*"	Facebook OR FB)
		(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR
		freshman OR freshmen OR sophomore* OR junior* OR senior* OR
	(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*"
	freshman OR freshmen OR sophomore* OR junior* OR senior* OR	OR "grade 11" OR "11th grade*") w/10 ("device" w/25 ("social media"
	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh	OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook
10	grade*" OR "grade 11" OR "11th grade*") w/10 "device"	OR FB))
		(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR
		freshman OR freshmen OR sophomore* OR junior* OR senior* OR
	(scholar* OR kid* OR child* OR pupil* OR teen* OR student* OR	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*"
	freshman OR freshmen OR sophomore* OR junior* OR senior* OR	OR "grade 11" OR "11th grade*") w/10 ("laptop*" w/25 "social media"
	"twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh	OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook
11	grade*" OR "grade 11" OR "11th grade*") w/10 "laptop*"	OR FB)
12	(screen w/3 time) OR screentime	((screen w/3 time) OR screentime) AND "health"
		((student* w/5 focus*) w/25 (problem* OR difficult* OR challeng* OR
		declin* OR unable* OR inabilit* OR issue)) AND ("social media" OR
	(student* w/5 focus*) w/25 (problem* OR difficult* OR challeng*	Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR
13	OR declin* OR unable* OR inabilit* OR issue)	FB)
	(vape* OR vaped OR vaping) w/5 (student* OR scholar* OR pupil*	((vape* OR vaped OR vaping) w/5 (student* OR scholar* OR pupil* OR
	OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile*	teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-
	OR "pre-teen*" OR preteen* OR adolescent* OR minor* OR teach*	teen*" OR preteen* OR adolescent* OR minor* OR teach* OR learn*))
14	OR learn*)	AND "health"
	abus* w/10 (student* or kid* or child* or teen* OR tween* OR	(abus* w/10 (student* or kid* or child* or teen* OR tween* OR youth*
	youth* OR young* OR juvenile* OR "pre-teen*" OR preteen* OR	OR young* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent*
15	adolescent* OR minor* OR underage OR domestic OR family)	OR minor* OR underage OR domestic OR family)) AND "health"

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 4 of 11 Disputed Terms

	А	В
		addict* w/5 ("social media" OR Instagram OR IG OR TikTok OR
16	"addict*"	YouTube OR Snap* OR Facebook OR FB)
	assault* w/10 ("ninth grade*" OR "9th grade*" OR "grade 9" OR	(assault* w/10 ("ninth grade*" OR "9th grade*" OR "grade 9" OR
	"eighth grade*" OR "8th grade*" OR "grade 8" OR "seventh grade*"	"eighth grade*" OR "8th grade*" OR "grade 8" OR "seventh grade*" OR
	OR "7th grade*" OR "grade 7" OR "sixth grade*" OR "6th grade*"	"7th grade*" OR "grade 7" OR "sixth grade*" OR "6th grade*" OR
	OR "grade 6" OR principal* OR staff OR administrat* OR employee*	"grade 6" OR principal* OR staff OR administrat* OR employee* OR
	OR teacher OR harass* OR viol* OR altercation* OR crim* OR	teacher OR harass* OR viol* OR altercation* OR crim* OR safety OR
	safety OR expel* OR suspen* OR discip* OR treat* OR consult* OR	expel* OR suspen* OR discip* OR treat* OR consult* OR train*)) AND
17	train*)	"health"
	assault* w/10 (school* OR class* OR district* OR campus* OR rate*	(assault* w/10 (school* OR class* OR district* OR campus* OR rate*
	OR disciplin* OR student* OR pupil* OR scholar* OR kid* OR	OR disciplin* OR student* OR pupil* OR scholar* OR kid* OR teen*
	teen* OR child* OR freshman* OR freshmen OR sophomore* OR	OR child* OR freshman* OR freshmen OR sophomore* OR junior* OR
	junior* OR senior* OR "twelfth grade*" OR "12th grade*" OR "grade	senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR
	12" OR "eleventh grade*" OR "grade 11" OR "11th grade*" OR "tenth	"eleventh grade*" OR "grade 11" OR "11th grade*" OR "tenth grade*"
18	grade*" OR "10th grade*" OR "grade 10")	OR "10th grade*" OR "grade 10")) AND "health"
	bully* OR bullie* w/5 (severe OR severity OR intens* OR repeat*	(bully* OR bullie*) w/5 ((severe OR severity OR intens* OR repeat* OR
	OR reptitive OR acute OR chronic OR serious OR extreme* OR	reptitive OR acute OR chronic OR serious OR extreme* OR major OR
	major OR problem* OR concern* OR report* OR ignore* OR	problem* OR concern* OR report* OR ignore* OR indifferen* OR fail*
	indifferen* OR fail* OR hotline OR helpline OR online OR internet	OR hotline OR helpline) w/10 (online OR internet OR "social media" OR
	OR "social media" OR Facebook OR FB OR Instagram OR IG OR	Facebook OR FB OR Instagram OR IG OR Snap* OR TikTok OR TT
19	Snap* OR TikTok OR TT OR Youtube OR YT OR text*)	OR Youtube OR YT OR text*))
		(Covid* w/10 quarantine) w/30 ("health*" OR success" OR "growth" OR
		"iPad" OR "laptop" OR "chromebook" OR "device" OR computer OR
20	Covid* w/10 quarantine*	"polic*" OR "instruction" OR "guidance" OR "protocol")"
	crim* W/10 (scholar* OR kid* OR child* OR pupil* OR teen* OR	(crim* W/10 (scholar* OR kid* OR child* OR pupil* OR teen* OR
	student* OR freshman OR freshmen OR sophomore* OR junior* OR	student* OR freshman OR freshmen OR sophomore* OR junior* OR
	senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR	senior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR
	"eleventh grade*" OR "grade 11" OR "11th grade*" OR "tenth	"eleventh grade*" OR "grade 11" OR "11th grade*" OR "tenth grade*"))
21	grade*")	AND "health"

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 5 of 11 Disputed Terms

	А	В
	danger w/10 (student* or pupil* or scholar* or kid* or child* or teen* OR tween* OR youth* OR "pre-teen*" OR preteen* OR adolescent* OR minor* OR underage)	(danger w/10 (student* or pupil* or scholar* or kid* or child* or teen* OR tween* OR youth* OR "pre-teen*" OR preteen* OR adolescent* OR minor* OR underage)) AND ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB)
	depress* w/10 (scholar* OR kid* OR child* OR student* OR pupil* OR freshman OR freshmen OR sophomore* OR junior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*" OR "11th grade*" OR "tenth grade*" OR "10th grade*" OR "ninth grade*" OR "9th grade*" OR "eighth grade*" OR "8th grade*" OR "seventh grade*" OR "7th grade*" OR "sixth grade*" OR "6th grade*")	depress* w/10 ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB) w/10 (scholar* OR kid* OR child* OR student* OR pupil* OR freshman OR freshmen OR sophomore* OR junior* OR "twelfth grade*" OR "12th grade*" OR "grade 12" OR "eleventh grade*" OR "11th grade*" OR "tenth grade*" OR "10th grade*" OR "ninth grade*" OR "9th grade*" OR "eighth grade*" OR "8th grade*" OR "seventh grade*" OR "7th grade*" OR "sixth grade*" OR "6th grade*")
	drug* w/5 (student* OR scholar* OR pupil* OR teen* OR tween* OR	(drug* w/5 (student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor* OR school*)) AND "health"
25	"Facebook"	"Facebook" w/30 ("health OR "threat*" OR "safe*" OR "warning" OR "counselor" OR "discipline" OR "attack" OR "bully*" or "bullie" OR "emergenc*" OR "conflict" OR "incident" OR "commentary" OR "media" OR "legal" OR "investigat*")"
	fight w/10 ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB OR student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*) "harass*"	fight w/10 (("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*)) harass* AND "health"
	hit* w/5 ("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB OR student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*)	hit* w/5 (("social media" OR Instagram OR IG OR TikTok OR YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar* OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*))
	hybrid W/10 learning	(hybrid W/10 learning) AND "health"

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 6 of 11 Disputed Terms

	А	В
		(incident* w/5 student*) AND ("social media" OR Instagram OR IG OR
30	incident* w/5 student*	TikTok OR YouTube OR Snap* OR Facebook OR FB)
	injur* w/10 ("social media" OR Instagram OR IG OR TikTok OR	injur* w/10 (("social media" OR Instagram OR IG OR TikTok OR
	YouTube OR Snap* OR Facebook OR FB OR student* OR scholar*	YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar*
	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR
31	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*)	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*))
	kick* w/10 ("social media" OR Instagram OR IG OR TikTok OR	kick* w/10 (("social media" OR Instagram OR IG OR TikTok OR
	YouTube OR Snap* OR Facebook OR FB OR student* OR scholar*	YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar*
	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR
	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*)	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*))
33	"lockdown*"	lockdown* AND "health"
	medicat* w/10 ("social media" OR Instagram OR IG OR TikTok OR	medicat* w/10 (("social media" OR Instagram OR IG OR TikTok OR
	YouTube OR Snap* OR Facebook OR FB OR student* OR scholar*	YouTube OR Snap* OR Facebook OR FB) w/10 (student* OR scholar*
	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR	OR pupil* OR teen* OR tween* OR kid* OR youth* OR child* OR
34	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*)	juvenile* OR "pre-teen*" OR preteen* OR adolescent* OR minor*))
		(pandemic* W/25 (impact OR negative OR harm*)) AND ("mental
35	pandemic* W/25 (impact OR negative OR harm*)	health" OR "social health" OR "emotional health")
		(remote W/10 class*) AND ("mental health" OR "social health" OR
36	remote W/10 class*	"emotional health")
		(remote W/10 learning) AND ("mental health" OR "social health" OR
37	remote W/10 learning	"emotional health")
		(remote W/10 school*) AND ("mental health" OR "social health" OR
38	remote W/10 school*	"emotional health")
		(remote W/10 social*) AND ("mental health" OR "social health" OR
39	remote W/10 social*	"emotional health")
		(remote W/10 teaching) AND ("mental health" OR "social health" OR
	remote W/10 teaching	"emotional health")
	sex* W/10 abuse*	(sex* W/10 abuse*) AND "health"
42	sex* W/10 assault*	(sex* W/10 assault*) AND "health"

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 7 of 11 Disputed Terms

	А	В
43	sex* W/10 viol*	(sex* W/10 viol*) AND "health"
		(social* W/3 distanc*) AND ("mental health" OR "social health" OR
	social* W/3 distanc*	"emotional health")
45	substance W/5 (disorder* OR abuse*)	(substance W/5 (disorder* OR abuse*)) AND "health"
		suspen* w/5 ((student* OR pupil* OR scholar* OR kid* OR teen* OR
		child* OR freshman* OR freshmen OR sophomore* OR junior* OR
	suspen* w/5 (student* OR pupil* OR scholar* OR kid* OR teen* OR	senior* OR rate* OR impact* OR trend* OR decline* OR increase*)
	child* OR freshman* OR freshmen OR sophomore* OR junior* OR	w/25 ("social media" OR Instagram OR IG OR TikTok OR YouTube OR
46	senior* OR rate* OR impact* OR trend* OR decline* OR increase*)	Snap* OR Facebook OR FB)
	teacher w/5 (shortage* OR quit* OR leav* OR "burnout" OR "burn	teacher w/5 (shortage* OR "burnout" OR "burn out" OR "burnt out")
47	out" OR "burnt out")	teacher w/3 (shortage* OK burnout OK burn out OK burnt out)
		(teacher* W/5 (retention OR retain*)) w/5 (problem OR trend OR reason
48	teacher* W/5 (retention OR retain*)	OR cause)
49	teacher* w/5 turnover	teacher* w/5 (turnover w/5 (problem OR trend OR reason OR cause))
		(therap* w/5 child*) AND ("mental health" OR "social health" OR
50	therap* w/5 child*	"emotional health")
		(therap* w/5 class*) AND ("mental health" OR "social health" OR
51	therap* w/5 class*	"emotional health")
		(therap* w/5 district*) AND ("mental health" OR "social health" OR
52	therap* w/5 district*	"emotional health")
		(therap* w/5 school*) AND ("mental health" OR "social health" OR
53	therap* w/5 school*	"emotional health")
		(therap* w/5 train*) AND ("mental health" OR "social health" OR
54	therap* w/5 train*	"emotional health")
		(weapon* w/5 (student* OR scholar* OR pupil* OR teen* OR tween*
	weapon* w/5 (student* OR scholar* OR pupil* OR teen* OR tween*	OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR
	OR kid* OR youth* OR child* OR juvenile* OR "pre-teen*" OR	preteen* OR adolescent* OR minor* OR school* OR class*)) AND
55	preteen* OR adolescent* OR minor* OR school* OR class*)	("mental health" OR "social health" OR "emotional health")
		"YouTube" w/30 ("health" OR threat*" OR "safe*" OR "warning" OR
		"counselor" OR "discipline" OR "attack" OR "bully*" or "bullie" OR
		"conflict" OR "incident" OR "commentary" OR "media" OR "legal" OR
56	"YouTube"	"investigat*")"

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 8 of 11 Disputed Terms

	А	В
		"social media" w/30 ("health OR "threat*" OR "safe*" OR "warning" OR
		"counselor" OR "discipline" OR "attack" OR "bully*" or "bullie*" OR
		"emergenc*" OR "conflict" OR "concern*" OR "content" OR "challenge"
57	"social media"	OR "legal" OR "outreach" OR "law" OR "incident" OR "investigat*")"
58	((social w/3 worker) AND teen*) w/25 need*	((social w/3 worker) w/25 teen*) w/25 need*
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 7 terms to capture documents discussing altercations,
		including misconduct* w/10 altercation* and misbehav* w/10
		altercation*. Defendants have not explained why this additional term is
59	altercation* w/5 consult*	necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 7 terms to capture documents discussing altercations,
		including misconduct* w/10 altercation* and misbehav* w/10
		altercation*. Defendants have not explained why this additional term is
60	altercation* w/5 crim*	necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 7 terms to capture documents discussing altercations,
		including misconduct* w/10 altercation* and misbehav* w/10
		altercation*. Defendants have not explained why this additional term is
61	altercation* w/5 discip*	necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 7 terms to capture documents discussing altercations,
		including misconduct* w/10 altercation* and misbehav* w/10
		altercation*. Defendants have not explained why this additional term is
62	altercation* w/5 expel*	necessary.
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 7 terms to capture documents discussing
		altercations, including misconduct* w/10 altercation* and misbehav*
		w/10 altercation*. Defendants have not explained why this additional
63	altercation* w/5 suspen*	term is necessary.

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 9 of 11 Disputed Terms

	А	В
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 7 terms to capture documents discussing altercations,
		including misconduct* w/10 altercation* and misbehav* w/10
		altercation*. Defendants have not explained why this additional term is
64	altercation* w/5 train*	necessary.
		Overbroad because not tied to the harms or claims at issue and would
		capture any document discussing when a student is disrupted. Plaintiffs
		have agreed to 14 terms that capture crisis, including "mental health" /15
		crisis. Defendants have not explained why this additional term is
65	crisis w/5 student*	necessary.
		Overbroad because not tied to the harms or claims at issue and would
		capture any document discussing when a student is disrupted. Plaintiffs
		have agreed to 42 terms that capture documents that relate students'
		focus, achievement, and performance. Defendants have not explained
66	disrupt* w/5 student*	why this additional term is necessary.
l		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
67	harass* w/5 consult*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
68	harass* w/5 crim*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
69	harass* w/5 discip*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
70	harass* w/5 expel*	additional term is necessary.

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 10 of 11 Disputed Terms

	А	В
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
71	harass* w/5 suspen*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 14 other terms to capture harassment documents,
		including harass* AND "health". Defendants have not explained why this
72	harass* w/5 train*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue. Plaintiffs
		have agreed to 37 other terms to capture documents about shootings,
		including shooting* w/10 health. Defendants have not explained why this
73	shooting* w/10 school*	additional term is necessary.
		Overbroad because not tied to the harms or claims at issue and would
		capture any document discussing the stress of a student. Plaintiffs have
		agreed to dozens of terms that capture documents that relate to the
		mental, emotional, or social health or wellbeing of students. Defendants
74	stress* w/5 student*	have not explained why this additional term is necessary.
		Burden; Plaintiffs have agreed to 21 other terms that capture documents
		related to suicide, including suicid* w/10 student*. Defendants have not
75	suicid* w/10 prevent*	explained why this additional term is necessary.
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 52 other terms that capture documents related to
		threats, including "social media" /30 threat*, challeng* w/5 threat*,
		threat* w/5 safety, and 13 other terms designed to capture documents
		related to school closures due to threats. Defendants have not explained
76	threat* w/5 district*	why this additional term is necessary.
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 52 other terms that capture documents related to
		threats, including "social media" /30 threat*, challeng* w/5 threat*,
		threat* w/5 safety, and 13 other terms designed to capture documents
		related to school closures due to threats. Defendants have not explained
77	threat* w/5 school*	why this additional term is necessary.

## Case 4:22-md-03047-YGR Document 1203-2 Filed 10/10/24 Page 11 of 11 Disputed Terms

	А	В
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 52 other terms that capture documents related to
		threats, including "social media" /30 threat*, challeng* w/5 threat*,
		threat* w/5 safety, and 13 other terms designed to capture documents
		related to school closures due to threats. Defendants have not explained
78	threat* w/5 student*	why this additional term is necessary.
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 52 other terms that capture documents related to
		threats, including "social media" /30 threat*, challeng* w/5 threat*,
		threat* w/5 safety, and 13 other terms designed to capture documents
		related to school closures due to threats. Defendants have not explained
79	threat* w/5 train*	why this additional term is necessary.
		Burden; Overbroad because not tied to the harms or claims at issue.
		Plaintiffs have agreed to 44 other terms that capture documents related to
		violence, including threat* w/5 viol*, challeng* w/10 violen*, violen*
		w/5 student*, and misconduct* w/10 viol*. Defendants have not
80	violen* w/5 school*	explained why this additional term is necessary.